

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

PERSONALWEB TECHNOLOGIES, LLC AND
LEVEL 3 COMMUNICATIONS, LLC,

Plaintiffs,

v.

NEC CORPORATION OF AMERICA, INC.,

Defendant.

Civil Action No. 6:11-cv-00655 (LED)

PERSONALWEB TECHNOLOGIES, LLC AND
LEVEL 3 COMMUNICATIONS, LLC,

Plaintiffs,

v.

GOOGLE, INC. AND YOUTUBE, LLC,

Defendants.

Civil Action No. 6:11-cv-00656 (LED)

PERSONALWEB TECHNOLOGIES, LLC AND
LEVEL 3 COMMUNICATIONS, LLC,

Plaintiffs,

v.

NETAPP, INC.,

Defendant.

Civil Action No. 6:11-cv-00657 (LED)

PERSONALWEB TECHNOLOGIES, LLC AND
LEVEL 3 COMMUNICATIONS, LLC,

Plaintiffs,

v.

AMAZON.COM, INC.; AMAZON WEB
SERVICES LLC; AND DROPBOX, INC.,

Defendants.

Civil Action No. 6:11-cv-00658 (LED)

PERSONALWEB TECHNOLOGIES, LLC AND
LEVEL 3 COMMUNICATIONS, LLC,

Plaintiffs,

v.

CARINGO, INC.,

Defendant.

Civil Action No. 6:11-cv-00659 (LED)

PERSONALWEB TECHNOLOGIES, LLC AND
LEVEL 3 COMMUNICATIONS, LLC,

Plaintiffs,

v.

EMC CORPORATION AND VMWARE, INC.,

Defendants.

Civil Action No. 6:11-cv-00660 (LED)

PERSONALWEB TECHNOLOGIES, LLC AND
LEVEL 3 COMMUNICATIONS, LLC,

Plaintiffs,

v.

AUTONOMY, INC., HEWLETT-PACKARD
COMPANY, AND HP ENTERPRISE
SERVICES, LLC,

Defendants.

Civil Action No. 6:11-cv-00683 (LED)

JOINT MOTION TO ENTER DISCOVERY ORDER

The parties in the above-captioned cases hereby move this Court to enter a Discovery Order of the form attached hereto. Plaintiff and Defendants were able to agree on all of Discovery Order language except the form of an E-Discovery Order. Accordingly, the parties attach hereto their respective E-Discovery Order proposals. By Wednesday, July 25, 2012, the parties will submit a single brief of no more than four pages explaining their respective positions on their respective proposed form of the E-Discovery Order.

Accordingly, the parties respectfully request that the Court enter a Discovery Order and an E-Discovery Order, and resolve the parties' dispute regarding the form of the E-Discovery Order.

DATED: July 23, 2012

Respectfully submitted,

By: /s/ Kalpana Srinivasan
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Attorneys for Plaintiff
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CERTIFICATE OF CONFERENCE

Counsel for Plaintiff has conferred with Counsel for Defendants regarding the Discovery Order, and the parties agree with this filing.

/s/ Kalpana Srinivasan
Kalpana Srinivasan

CERTIFICATE OF SERVICE

I hereby certify that on July 23, 2012, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Eastern District of Texas, using the electronic filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Kalpana Srinivasan
Kalpana Srinivasan